

REMARKS

Claims 16, and 18-26 were pending at the time of the Office Action. Claim 20 is amended in this response. Claims 27-35 are new claims. No new matter is added. Claims 16, and 18-35 are pending at this time. Claim 16 and 31 are independent claims. Reconsideration and allowance of the above-referenced application are respectfully requested.

Interview Summary

Examiner Swearingen is thanked for the courtesy of the telephone interview with Applicants' representative Sushil Shrinivasan conducted on April 21, 2008. During the interview, Applicants' representative asked the Examiner if amending the Specification to include language providing sufficient antecedent basis for the term "computer-readable medium" is an acceptable solution. Examiner Swearingen agreed that such an amendment is an acceptable solution.

Specification

The disclosure is objected to for lack of sufficient antecedent basis for the claimed article that resides on a computer-readable medium. The language in the section titled "Amendments to the Specification" obviate the objections to the disclosure. As amended, the Specification describes a computer-readable medium, thereby providing sufficient antecedent basis for the claimed article. Accordingly, it is respectfully requested that the objections to the Specification be withdrawn.

35 USC 102

Claims 16 and 18-26 stand rejected under 35 USC 102(a) as allegedly being anticipated by Hemphill et al. (US 6,167,448), hereinafter "Hemphill." The rejections are respectfully traversed. Hemphill does not describe all the features of the claimed subject matter.

Claim 16 recites "receive discovery data collected from a discoverable network device by two or more discovery agents; aggregate said discovery data; generate a relationship file characterizing relationships among discoverable network devices identified by the two or more discovery agents; coalesce the discovery data in a software file comprising a discovery document, said discovery data including two or more duplicate data entries, wherein each of the duplicate entries relates to a discoverable network device identified by the two or more discovery agents; and remove all but one of the duplicate data entries from the discovery document." (Emphasis added).

Hemphill describes an event notification system for a network including a managed device that includes one or more management agents that detect one or more management events of a plurality of possible management events. The managed device further includes event notification logic that generates an event notification message (ENM) which includes event related information. See, e.g., Hemphill at Abstract. Further, Hemphill describes a management system including a management server, one or more managed elements, and a client system that are coupled together using one or more network architectures or technologies. See, e.g., Hemphill, col. 3, lines 4-7. The managed elements are divided into two different types including web-enabled devices or Hyper-Media Managed Devices (HMMDs) and legacy devices. See, e.g., Hemphill, col. 3, lines 16-23. The HMMDs include one or more management agents called Hyper-Media

Managed Objects (HMMO) that access the management data of the corresponding HMMD. See, e.g., Hemphill, col. 3, lines 29-40. Hemphill does not describe that legacy devices include agents that collect management data about the legacy devices.

With respect to claim 16, Hemphill does not describe "a relationship file," as recited in claim 16. As claimed, a relationship file characterizes relationships among discoverable network devices identified by the two or more discovery agents. The portion of Hemphill cited by the Office states:

The management server 102 also converts data from the legacy devices 112 into a form that may be browsed.

See, Hemphill, col. 4, lines 15-17.

Thus, Hemphill describes that a management server converts data from the legacy devices into a form that may be browsed. However, in Hemphill, the legacy devices are not identified by two or more discovery agents. In contrast, Hemphill describes that data from the legacy devices are managed and controlled by the management server, so that the client system might not necessarily have direct access. See, e.g., Hemphill, col. 5, lines 16-19. Hemphill does not describe any agent that collects data from the legacy devices. Because the data from legacy devices is not collected by agents, the data related to the legacy devices is not "a relationship file characterizing relationships among discoverable network devices identified by two or more discovery agents," as claimed.

Further, Hemphill describes that HMMDs each convert management data into a form that may be browsed using Internet technology. See, e.g., Hemphill, col. 3, lines 29-36. However, no portion of Hemphill describes that the management data characterizes relationships among the HMMDs identified by the two or more HMMOs. In contrast, Hemphill describes that

security of and access to management data of a HMMD is provided by including a managed element communication layer that includes separate servers for each installed HMMO. See, e.g., col. 3, lines 36-43. Thus, the management data collected by the HMMO does not characterize relationships between HMMDs. Rather, Hemphill describes that the management data of a HMMD is used by a communication layer to access the HMMD. Because the form into which the HMMDs convert the management data does not characterize relationships among the HMMDs, the converted data is not "a relationship file," as claimed. Neither the cited portion nor any other portion of Hemphill describes a relationship file that characterizes HMMDs identified by the HMMOs. Therefore, Hemphill does not describe "generate a relationship file characterizing relationships among discoverable network devices identified by the two or more discovery agents," as recited in claim 16.

Furthermore, Hemphill does not describe "said discovery data including two or more duplicate data entries, wherein each of the duplicate entries relates to a discoverable network device identified by the two or more discovery agents," as claimed. The portion of Hemphill cited by the Office states:

The management server 102 periodically collects and saves configuration information in the database 128 in a common form regardless of whether the information was originally web-based, SNMP or DMI. For example, the management server 102 stores events and traps, and enables configuration of filters that ultimately generate queries that are used to select records from the database 128. The management server 102 also enables access of the database 128.

See, Hemphill, col. 4, lines 45-52.

Thus, Hemphill describes periodically collecting and saving configuration information in the database in a common form. Neither the cited portion nor any other portion of Hemphill

describes that the data obtained from the HMMOs includes two more duplicate entries, wherein each of the duplicate entries relates to a HMMD identified by the two or more discovery agents. Although Hemphill describes that each HMMD includes one or more management agents (HMMOs), Hemphill does not teach that two or more HMMOs identify a HMMD. Hemphill describes that HMMOs may operate as self-describing web agents that use common web-enabling components to provide registration discovery, security, and HTTP communications. Further, Hemphill describes that HMMO web agents render information in HTML, or in scripting language, or a combination of both, for viewing by a browser on the client system 106. The information may also be sent directly to the management server 102. See, e.g., col. 4, lines 8-11. In contrast, claim 16 describes discovery data in a software file that includes two or more duplicate entries, where each of the duplicate entries relates to a discoverable network device identified by the two or more discovery agents.

Because Hemphill does not teach discovery data including two or more duplicate entries, Hemphill does not teach all the features of claim 16. In addition, because Hemphill does not teach duplicate entries, Hemphill certainly does not teach removing all but one of the duplicate entries from the discovery document, as claimed. Furthermore, Applicants respectfully submit that the Office has not cited any portion of Hemphill in support of the contention that Hemphill teaches "two or more duplicate data entries," as claimed.

Therefore, Hemphill does not describe all the features of claim 16. Accordingly, claim 16 is patentable. Claims 18-26 are also patentable at least for similar reasons and for the additional recitations that they contain.

For example, claim 21 recites "identify two or more agents responsible for generating the two or more duplicate data

entries, each agent having a priority value; compare the priority values of the two or more agents; identify a first agent having a highest priority, said first agent responsible for generating a first duplicate data entry in the two or more duplicate data entries; and remove all but the first duplicate data entry." The portion of Hemphill cited by the Office in support of the rejection of claim 21 states:

The management server 102 also enables a user to create device groups for business process views by filtering for selected devices and for selected events of those devices. The management server 102 handles events, such as SNMP traps and HTTP alerts, logs the events and allows a user to set event filters.

See, Hemphill, col. 4, lines 60-65.

Thus, the cited portion of Hemphill describes device groups for business process views created by filtering for selected devices and for selected events of those devices. Because Hemphill does not describe "duplicate entries," as claimed, Hemphill does not teach identifying agents responsible for generating the duplicate entries. Furthermore, no portion of Hemphill describes priority values for the agents, as claimed. Claim 21 is patentable for this additional reason.

Claim 31 recites "receiving discovery data collected from a discoverable network device by two or more discovery agents; aggregating said discovery data; generating a relationship file characterizing relationships among discoverable network devices identified by the two or more discovery agents; coalescing the discovery data in a software file comprising a discovery document, said discovery data including two or more duplicate data entries, wherein each of the duplicate entries relates to a discoverable network device identified by the two or more discovery agents; and removing all but one of the duplicate data entries from the discovery document." Claim 31 should be

allowable at least for reasons similar to claim 16. Claims 32-35 should also be allowable at least for similar reasons and for the additional recitations that they contain.

CONCLUSION

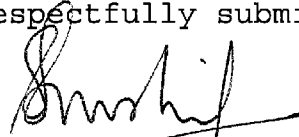
It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the remarks made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the foregoing amendments and remarks, Applicants respectfully submit that the application is in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicant asks that all claims be allowed. Please apply any credits or charges to deposit account 06-1050.

Respectfully submitted,

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Sushil Shrinivasan
Reg. No. L0368

Fish & Richardson P.C.
PTO Customer No.: 20985
(858) 678-5070 telephone
(858) 678-5099 facsimile

10806998.doc